

JATMA

JAPAN AUTOMOBILE TYRE MANUFACTURERS ASSOCIATION, INC.

No.33 Mori Building, 3-8-21 Toranomon, Minato-ku, Tokyo, 105-0001 Japan
Phone: 81-3-3435-9094 Fax: 81-3-3435-9097 e-mail: jatmatec@gol.com

February 19, 2002

Docket Section (Docket Number NHTSA-01-11157)

National Highway Traffic Safety Administration

400 Seventh Street, SW

Washington DC 20590

USA

Subject: Docket Number NHTSA-01-11157

JATMA Comments on the Notice of Proposed Rulemaking of Tire Safety Information
issued by National Highway Traffic Safety Administration as per Federal Register Vol. 66,
No. 244 dated Dec.19,2001

Dear Sirs,

Please find attached the JATMA comments on the Notice of Proposed Rulemaking
of Tire Safety Information issued by National Highway Traffic Safety
Administration as per Federal Register Vol. 66, No. 244 dated Dec.19, 2001.

Best Regards,

Motomu Shinohara

General Manager of Technical Department

The Japan Automobile Tyre Manufacturers Association Inc.

JATMA

JAPAN AUTOMOBILE TYRE MANUFACTURERS ASSOCIATION, INC.

No.33 Mori Building, 3-8-21 Toranomon, Minato-ku, Tokyo, 105-0001 Japan
Phone: 81-3-3435-9094 Fax: 81-3-3435-9097 e-mail: jatmatec@gol.com

JATMA Comments on the NPRM of Tire Safety Information

49 CFR Parts 567, 571, 574 and 575 [Docket Number NHTSA-01-11157]

RIN 2127-AI32

We are very disappointed because our comment to the ANPRM which was submitted on Jan.30,2001, was not reflected in the NPRM issued on Dec.19, 2001. We would like to submit our comments again strongly requesting you to reconsider the following.

1. Tire Identification Number (TIN) on Both Sidewalls

We object to forcing a tire manufacturer to mark TIN on both tire sidewalls.

In the curing process, an worker is exposed to danger because they would have to look up into the curing machine standing on the unstable lower half 's edge of the curing machine. They could fall off and suffer burns, bone fracture or blow on head, arm, hand, leg, the back, and so on. In the worst case, a mis-operation of the curing machine could lead to an accident involving death. Furthermore, it will force us a huge amount of cost so we object to the proposed tire identification number on both sidewalls.

2. Reordering the Sequence of TIN

The current TIN labeling is well understood by the consumers, not only in the USA but also in Japan and other countries. Reordering the sequence of the TIN will be the cause of following two problems.

A) it takes many years to reeducate the consumers.

B) tires with two different TIN labeling will coexist causing confusion among the consumers.

Furthermore, this change will require the cost to be huge because a modification of the mold and change of computer programs will be necessary. Therefore, we do not agree to reorder the sequence of TIN.

3. Maximum Tire Inflation Pressure

The recommended inflation pressure most suitable for the vehicle's weight, speed performance, load distribution and so on, is indicated on the vehicle. (Even if tire size is same, the recommended tire inflation pressure varies according to the vehicle by make, model and year.) A consumer generally does not understand the difference between tire inflation pressure marked on a tire and another inflation pressure indicated on a vehicle. Then indication of different tire inflation pressures by a vehicle manufacturer and a tire manufacturer may lead a consumer to misunderstanding and confusion. Besides, inflating a tire up to maximum tire pressure in spite of light load on a tire may cause uneven wear and other failures.

Therefore Maximum Tire Inflation Pressure should be ceased to mark on a tire.

4. Maximum Load Rating

Gross weight of vehicle is a total of vehicle weight, passenger weight, loading weight, and additional accessories weight. The load on a tire varies from axle to axle due to difference of a load distribution.

It is generally difficult for a consumer to know the actual load on his tire.

Accordingly, even if maximum load rating is marked on a tire, it does not give any value to consumers and then maximum load rating does not need to be marked.

It is necessary for consumers to refer to maximum lading load capacity of his vehicle (the combined weight of occupants and cargo) and appropriate inflation pressure at the load in vehicle placard and /or owners manual.

Moreover, a load index needs to be marked as a parameter to choose a suitable replacement tire for the vehicle (referring to a tire size specified by a vehicle manufacturer).

5. Number of Plies and Cord Materials

Number of Plies and Cord Materials might be used in the past for consumers to know a tire performance level.

JATMA

JAPAN AUTOMOBILE TYRE MANUFACTURERS ASSOCIATION, INC.

No.33 Mori Building, 3-8-21 Toranomom, Minato-ku, Tokyo, 105-0001 Japan
Phone: 81-3-3435-9094 Fax: 81-3-3435-9097 e-mail: jatmatec@gol.com

Nowadays they are not meaningful for a consumer and are not needed.

But in case of a rayon carcass tire, marking of material is needed because tire strength requirement for a rayon carcass tire differs from the one for a tire made of other materials.